UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Elnora Carthan, et al,   Case No 5:16-cv-10444-JEL-MKM
          Plaintiffs,   Hon. Judith E. Levy

v.   Mag. Judge Mona K. Majzoub

Governor Rick Snyder, et al,
          Defendants.

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CITY DEFENDANTS' DISCLOSURE OF PRIOR DISCOVERY PURSUANT TO THE DISCOVERY COORDINATION PROTOCOL ORDER

Pursuant to the City Defendants (City of Flint, Darnell Earley, Gerald Ambrose, Dayne Walling, Howard Croft, Michael Glasgow, and Daugherty Johnson), disclose the following pursuant to paragraphs III(C)(i)-(iii) and IV(E)(i)-(ii) of the Court's August 17, 2018 Discovery Coordination Protocol Order, Dkt 566.

1. The City Defendants participated with other parties in the service of four non-party, documents-only subpoenas to the U.S. Environmental Protection Agency, Genesee County Health Department, Virginia Polytechnic Institute and State University, and Professor Marc Edwards in In re Flint Water Cases, Case No. 5:16-cv-10444-JEL-MKM. These subpoenas were served on June 15, 2018, but documents have not yet been produced in response.

2. Counsel for the City of Flint participated in the following depositions in *Concerned Pastors for Social Action, et al., v Khouri, et al.,* E.D. Mich.

Case No. 2:16-cv-10277-DML-SDD, a case arising out of the contamination of the City of Flint's water supply.

Deponent	Noticed By:	Date of Deposition	Recording Method	Confidentiality
Dr. Daniel E. Giammar	Richard Kuhl on behalf of Nick Khouri/RTAB	6/27/2016	Transcribed	None
Dr. Bruce P. Lamphear	Richard Kuhl on behalf of Nick Khouri/RTAB	6/16/2016	Transcribed	No
Cynthia Roper	Richard Kuhl on behalf of Nick Khouri/RTAB	6/29/2016	Transcribed	No
Chris Kelenske	Dimple Chaudhary on behalf of NRDC	7/8/2016	Transcribed & videotaped	No
JoLisa McDay	Dimple Chaudhary on behalf of NRDC	7/7/2016	Transcribed	No
Rodney Branch	Dimple Chaudhary on behalf of NRDC	7/6/2016	Transcribed	No
Dawn Steel	Dimple Chaudhary on behalf of NRDC	7/6/2016	Transcribed	No

3. In case number 16T(A-D)2850, pending in the 67th District Court, and case number 18-0425590FH, pending in the 7th Circuit Court, criminal counsel for Darnell Earley, Gerald Ambrose, Howard Croft, and Daugherty Johnson have been provided with ongoing document productions by the Michigan Attorney General's Office of Special Counsel, that are subject to a protective order, rule, statute, or privilege prohibiting any disclosure of those materials.

Respectfully Submitted,

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